

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re : Chapter 13
WHITNEY BURNS, : Case No. 25-11083-DJB
Debtor. :

X

**STIPULATION RESOLVING DEBTOR'S MOTION FOR SANCTIONS
AGAINST ONEMAIN FINANCIAL GROUP, LLC**

This Stipulation is made and entered into by and between Whitney Burns, by and through her counsel, Stephen M. Dunne, Esq., and OneMain Financial Group, LLC, by and through its counsel, in connection with the Debtor's Motion for Sanctions filed at Docket No. 18.

RECITALS

WHEREAS, the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on March 20, 2025;

WHEREAS, Creditor filed a Proof of Claim asserting a perfected security interest in a 2015 Honda Pilot;

WHEREAS, the Debtor disputed the secured status of the claim and filed a Motion for Sanctions alleging that Creditor asserted a fraudulent secured claim (the "Motion");

WHEREAS, Creditor disputes any wrongdoing, but to avoid further litigation, the parties have agreed to resolve their differences on the terms set forth herein.

STIPULATION

NOW, THEREFORE, it is hereby stipulated and agreed by and between the Parties, through their respective undersigned counsel, as follows:

1. The above referenced Recitals are hereby incorporated herein by reference.
2. Creditor shall amend its secured Proof of Claim to reflect unsecured status within thirty (30) days of entry of the Order approving this Stipulation.

3. Creditor shall not file any objection to the Debtor's discharge or initiate any adversary proceeding under 11 U.S.C. §§ 523 or 727.
4. Upon entry of an Order approving this Stipulation, the Debtor's Motion for Sanctions shall be deemed withdrawn with prejudice.
5. This Stipulation shall not be construed as an admission of liability by either party.
6. This Stipulation is subject to approval by the Bankruptcy Court, and shall become effective upon entry of an order approving it.

DUNNE LAW OFFICES, P.C.

/s/ Stephen Dunne
Stephen M. Dunne, Esq.
1515 Market Street, Suite 1200
Philadelphia, PA 19102
Phone: (215) 551-7109
Fax: (215) 525-9721
Email: stephen@dunnelawoffices.com
Counsel to Whitney Burns

DUANE MORRIS LLP

/s/ Peter E. Meltzer
Peter E. Meltzer, Esq.
2000 Market Street, Suite 1300
Philadelphia, PA 19103
Telephone: (267) 295-3363
Facsimile: (215) 564-7699
Email: pmeltzer@wglaw.com
Counsel to OneMain Financial Group, LLC

IT IS SO ORDERED.

Dated: _____, 2025

Derek J. Baker,
UNITED STATES BANKRUPTCY JUDGE